Filed in District Court
State of Minnesota
6/21/2022 1:52 PM

STATE OF MINNESOTA DISTRICT COURT

COUNTY OF RAMSEY SECOND JUDICIAL DISTRICT

Starr Suggs,

Plaintiff,

vs.

Minnesota Board of Peace Officer Standards and Training,

Defendant.

Court File No.: 62-CV-22-2981
Judge: Sara R. Grewing
Case Type: Employment

SUMMONS

THIS SUMMONS IS DIRECTED TO DEFENDANT MINNESOTA BOARD OF PEACE OFFICER STANDARDS AND TRAINING, BY AND THROUGH THE OFFICE OF THE MINNESOTA ATTORNEY GENERAL, 445 MINNESOTA STREET, SUITE 1400, SAINT PAUL, MN 55101.

1. **YOU ARE BEING SUED**. The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS**. You must give or mail to the person who signed this Summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

HALUNEN LAW
1650 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

3. **YOU MUST RESPOND TO EACH CLAIM**. The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

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4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

6. **ALTERNATE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: June 9, 2022

HALUNEN LAW

/s/ Maria B. Shatonova

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ATTORNEYS FOR PLAINTIFF

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COMPLAINT AND JURY DEMAND

Plaintiff Starr Suggs ("Suggs" or "Plaintiff"), for her Complaint against Minnesota Board of Peace Officer Standards and Training ("POST" or "Defendant"), states and alleges as follows:

INTRODUCTION

1. POST is an administrative body of the State of Minnesota that sets regulations and controls the training and licensing of police officers. POST is also authorized to receive, manage, and process complaints from the public about officer behavior that violates the Standards of Conduct. POST is funded through surcharges on certain criminal and traffic offenses.

2. Plaintiff Starr Suggs is a Black/African-American woman, who was an exemplary employee of POST for 28 years. Beginning in about 2016, she began to experience more overt racist behavior on the part of POST leadership, including for example, a display of Confederate soldier models in POST's Executive Director's office, derogatory statements made about Black state leaders, the display of a Thin Blue Line "Blue Lives Matter" flag in her co-worker's office, and calling supporters of the Black Lives Matter movement "ignorant savages" after the murder of George Floyd. Plaintiff also faced discrimination: she was treated differently from her white

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counterparts and was continuously held to a higher standard. The discriminatory practices were not limited to employment, but also applied to the general public whom POST serves. Plaintiff witnessed POST employees refer to the complaints made by the Black civilians as the "negro files" and complaining about their manner of speaking.

3. Plaintiff tried to address the discrimination directly by internally reporting the incidents and her discomfort with what she was experiencing. Instead of taking Plaintiff's multiple complaints of discrimination seriously and rectifying the discriminatory and hostile work environment, POST retaliated against Plaintiff. She was reprimanded precisely *because* she complained of discrimination. When the Minnesota Department of Human Rights found probable cause that POST retaliated against Plaintiff, the retribution against her was swift. The following month she was stripped of most of her duties, leaving her isolated and humiliated. A few months later her co-workers made racist and threatening comments about protesters outside the POST office—protestors who included Black mothers who lost children to police violence, who were peacefully demanding justice for Amir Locke. Plaintiff begged her POST coworkers to stop, but they did not. Not long after that, Plaintiff, as a Black mother, could no longer tolerate working for an organization that in her words was "at least partly responsible for the climate in which Black men have lost their lives at the hands of police." She saw the writing on the wall that termination was imminent if POST could not get her to quit. She also knew that she could no longer tolerate the racist, hostile, and retaliatory workplace promoted by POST's highest management. Plaintiff had no choice but to leave that toxic environment and resign.

PARTIES

4. Plaintiff is a Black/African-American woman, who resides in Hennepin County, Minnesota.

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5. Defendant POST is an administrative body of the State of Minnesota with its principal place of business located at 1600 University Ave., Suite 200, St. Paul, Minnesota 55104.

6. At all relevant times, Suggs and POST were "employee" and "employer," respectively, within the meaning of the Minnesota Human Rights Act ("MHRA"), Minn. Stat. § 363A.03, subds. 15 and 16.

JURISDICTION AND VENUE

7. This is an action brought to remedy POST's discriminatory conduct directed at Suggs on the basis of her race and retaliatory conduct after she reported discrimination.

8. Suggs invokes the jurisdiction of this Court because the violations of law described in this Complaint occurred in the State of Minnesota and involve Minnesota law.

9. At all relevant times, Suggs worked at POST, at 1600 University Ave., Suite 200, St. Paul, Minnesota 55104.

10. Venue is appropriate in this Court pursuant to Minn. Stat. § 542.09, because POST has an office or business place within the borders of Ramsey County.

FACTS

1. Plaintiff is a Black/African-American woman. She started her employment in 1994, and has dedicated 28 years to POST. In 2005, she was promoted to the Office Administrative Assistant Intermediate and has been in that role until her constructive discharge on March 16, 2022.

2. Throughout her 28 years at POST, Plaintiff diligently served the public and was an exemplary employee. Because she worked in the front of the office, she was often referred to as the "face" of POST.

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3. Plaintiff was the only long-term Black employee at POST. Only a handful of other people of color worked there, but their tenures were short.

4. In 2015, the Board appointed Nathan Gove as an Executive Director; and at the end of 2017 the new Assistant Executive Director Erik Misselt was hired.

5. After starting to report to the new Directors, Plaintiff noticed a drastic change in her work environment. As early as 2016, she experienced microaggressions and differential treatment, culminating in discriminatory, racist, and hostile comments and remarks.

Plaintiff Witnesses Race Discrimination at POST

6. In 2016, Plaintiff noticed that Executive Director Gove displayed 8 to 12-inch models of Confederate soldiers in his office. When she first noticed the display, Suggs complained to Human Resources that the Confederate models made her feel uncomfortable.

7. Gove left the Confederate models on display for another three months. The continued open display of the Gove's support for the Confederacy made Plaintiff, the only Black employee, feel unsafe at POST and created a hostile work environment.

8. After Erik Misselt became Assistant Executive Director, Plaintiff also heard Gove, Misselt, and the former Continuing Education Coordinator Robert Hawkins[1] speak negatively about the Department of Public Safety Commissioner John Harrington, the Minneapolis Police Chief Medaria Arradondo, the Minnesota Attorney General Keith Ellison as well as the appointment of Clarence Castile to the POST Board. Among other things, POST leadership referred to these individuals, who all happen to be Black men, as "stupid" and "incapable." Plaintiff never heard the POST leadership speak in a similar manner about departments with white leaders.

[1] Hawkins was later promoted to the Assistant Executive Director, and was also designated as the Affirmative Action Officer.

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9. Furthermore, Plaintiff heard Hawkins and Standards Coordinator Angie Rohow refer to the complaints against officers made by Black members of the public as the "negro files."

10. In March of 2018, a Black civilian came in to file a complaint against an officer. Misselt, upon learning that the person was Black, first delayed meeting with him for an hour and when the man asked to use the bathroom, Misselt stated, "I bet he's in the bathroom shooting up drugs," perpetuating a stereotype that Black people are frequent drug users. Misselt proceeded to assist the Black civilian in a very demeaning manner, showing his irritation with the Black man's complaint about an officer. Plaintiff did not observe Misselt make such statements about white members of the public or treat white civilians in the same demeaning manner.

11. In addition, on numerous occasions from 2018 until 2020, Rohow openly complained about callers who spoke African American Vernacular English (AAVE), stating that she could not understand them. Misselt often affirmed her negative remarks with "Roger that." This made Plaintiff feel like she did not belong at POST.

12. As a result of open criticism of AAVE at POST, Plaintiff's only Black co-worker at the time, an Office & Administrative Specialist ("OAS") who was employed from July 2018 until September 2019, confided in Plaintiff that POST's discriminatory sentiments toward Black members of the public made her feel "less-than" human and that she tried to adjust her speech at the office to sound more "Caucasian."

13. In 2018 and 2019, Continuing Education Coordinator Michele Haggberg told Plaintiff that the rules did not apply to her because she was "white and privileged." Plaintiff brought her concerns about Haggberg's statements to Misselt, who told her to address it with Haggberg herself. Plaintiff then had to explain that she was making a complaint, and it was his job as a Director to address such issues, but he never investigated or responded to Plaintiff's complaint.

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14. The overt and continuous scorn and discrimination of Black people by her co-workers and supervisors created a hostile work environment, making it difficult for Plaintiff to perform her duties.

15. Plaintiff also observed that Misselt was unfairly scrutinizing her and her Black colleague's work as compared to their white counterparts. Despite giving Plaintiff satisfactory performance reviews, Misselt frequently pointed out minor mistakes which oftentimes were outside of her control. Misselt additionally often wrongfully blamed Plaintiff and the OAS for mistakes white employees made. Such behavior was in contrast to the way Misselt treated white employees.

16. Moreover, the OAS was prohibited from performing her job while listening to the Minnesota Public Radio with her headphones on. At the same time, white employees, including Misselt, often had music on in their offices with their doors open. Plaintiff remembers Haggberg listening to rapper DMX's "Party Up" song with her door open. To Plaintiff's knowledge, Haggberg was not asked to lower the volume, let alone reprimanded for blaring such a vulgar song while on duty.

17. Further illustrating the intolerant and discriminatory environment at POST, Plaintiff not only experienced microaggressions directed at her, but also witnessed POST employees do the same to people of marginalized identities:

a. Plaintiff was once told by a co-worker that she could not see her in a relatively well-lit room, referring to Plaintiff's skin color.

b. Whenever a person spoke with any accent, Misselt with irritation stated that it sounded "Chinese" to him.

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c. Plaintiff was also told by a co-worker that Gove did not like employees wearing hoodies due to his prior experience in law enforcement.

d. Plaintiff also overheard a co-worker make fun of a transgender employee at the Minnesota IT Services, stating that she did not know if she was speaking to a man or a woman. This joke was shared by Misselt, who laughed and rolled his eyes.

e. Gove once approached Plaintiff and out of nowhere told her that his favorite movie was Django Unchained because it was about a "slave buff."

Plaintiff reports discrimination and POST retaliates

18. At the end of 2018 and beginning of 2019, Plaintiff started to report Misselt's discrimination and promotion of a hostile work environment to the Human Resources Director Yvonne Shorts Lind, the Director of Internal Affairs/Affirmative Action Lynn Mueller, and POST Board Chair Kelly McCarthy.

19. In February 2019, Plaintiff and the OAS filed a complaint of race and sex discrimination with the Department of Public Safety, Internal Affairs Division. The investigation concluded that Misselt's comments "did not show culture awareness or sensitivity" and recommended that he and Gove "must work together to address the lack of trust and the perceptions of inequity with all employees, but especially [Plaintiff]."

20. In the spring of 2019, Misselt retaliated against Suggs by designating specific times for Suggs and the OAS to take lunch breaks and prohibiting them from eating at their desks. This lunch break requirement applied only to the two Black employees who reported discrimination, while the other employees, who had not complained, were still allowed to take lunch freely and to continue to eat at their desks. In comparison, Haggberg, a white counterpart, was allowed to have a flexible lunch schedule.

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21. On June 12, 2019, Misselt reprimanded the OAS for allegedly spreading rumors about him breaking Plaintiff's office chair. He claimed that Plaintiff accused her of starting the gossip (which was a lie). When Plaintiff confronted Misselt in this lie, he immediately became defensive.

22. Plaintiff in response stated that she and the OAS were being treated differently because of their race and that this was discrimination. Misselt became irritated with Plaintiff when she refused to discuss her protected report alone in his office and behind closed doors.

23. A few weeks later, on July 2, 2019, Gove issued Plaintiff a Letter of Expectation stating words to the effect "you can't just go and call people racist." The letter stated that Suggs engaged in "unprofessional, accusatory, or disrespectful conduct" and falsely accused her of having the wrong demeanor or tone when speaking to Misselt.

24. On July 23, 2019, Plaintiff filed a charge with the Equal Employment Opportunity Commission ("EEOC") and the Minnesota Department of Human Rights ("MDHR") alleging race, age, and sex discrimination as well as retaliation.

25. On August 19, 2019, Misselt issued Suggs an annual review, rating her as "Needs Improvement" in the areas of Integrity and Professionalism. Misselt explicitly reprimanded her for "accus[ing] me of racial discrimination and retaliation" and for refusing to move the conversation to a private location.

26. The direct and immediate retaliation further intensified the hostile work environment, made it harder for Plaintiff to perform her job, and interfered with the privileges of her employment.

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27. In September 2019, the OAS—Plaintiff's only Black colleague—resigned from her employment at POST because she was no longer able to endure Misselt's discriminatory and retaliatory treatment.

28. In January 2020, Misselt became the new Executive Director, upon Gove's retirement.

Discriminatory Sentiments at POST Intensify after the Murder of George Floyd

29. Anti-Black sentiments at POST worsened after the murder of George Floyd on May 25, 2020. Shortly after the murder, Hawkins told Plaintiff that Chauvin had a "real Buckwheat moment," Plaintiff believes Hawkins was referring to the Buckwheat character from the Little Rascals and a term often used to demean Black people.

30. In addition, Plaintiff witnessed Hawkins and Rohow refer to Black Lives Matter supporters as "terrorists," "stupid animals," and "ignorant savages." As a Black person, Plaintiff was offended by these discriminatory statements, making her feel like she did not belong at POST due to her race.

31. In the summer of 2020 and in 2021, Suggs heard Hawkins, Misselt, and former Assistant Executive Director Jeff Winger make comments denying that police ever racially profile Black men.

32. After the January 6, 2021, Capitol Insurrection, Rohow hung the Thin Blue Line American flag in her office showing her support for the Blue Lives Matter movement.[2] The display of the flag right after the Insurrection made Suggs feel unsafe at POST, and this in combination

[2] Displaying this flag violates Minnesota law, which prohibits the display of political items on government walls or desks. See *https://mn.gov/mmb/assets/32-politicalactivitiesof-stateempl_tcm1059-233687.pdf*

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with Rohow's comments, such as the "negro files" and "ignorant savages," made Suggs believe that Rohow was displaying her support for white supremacy.

33. Although Suggs requested the flag to be removed in January, Rohow displayed it until April 2021.

34. POST's continued anti-Black sentiment and now recurring support of white supremacy in the office further complicated Plaintiff's performance of her job duties and responsibilities.

MDHR Concludes that POST Retaliated against Suggs; POST Continues to Retaliate.

35. On November 3, 2021, MDHR determined that Probable Cause existed to conclude that POST engaged in retaliation.

36. Upon learning of MDHR's finding, POST's retaliation against Plaintiff continued and intensified.

37. In December 2021, Suggs was informed she was no longer responsible for processing Continued Education Credits as well as officers' license renewals—the tasks Plaintiff performed for the past five years, which also made up a significant part of her daily responsibilities. The duties were assigned to white employees and caused Plaintiff to be isolated and humiliated.

38. During a staff meeting on December 22, 2021, a new hire praised Plaintiff for all the help and support she extended during her first days at POST, to which Misselt responded by dismissing Plaintiff and saying "Whatever . . . Moving on . . ."

39. On February 9, 2022, concerned members of the public organized a protest to demand justice for Amir Locke outside of POST's office, many of attendees and speakers were Black and POC mothers who lost their children to police violence. Plaintiff observed Misselt and other POST employees make statements such as "I will cut them up," "get your blades ready, we

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should all be prepared," "I have brass knuckles, I am ready to fight," "They will break the door out, get your guns ready."

40. Even after Plaintiff begged her coworkers to stop their discriminatory behavior, explaining that those were just mothers pleading for accountability, the comments continued, leaving Plaintiff feeling unsafe.

41. On February 15, 2022, Plaintiff was approached by a white co-worker, who stated words to the effect of "Why is it called White Supremacy… I think it should just be called Supremacy?" The same day, Plaintiff again reported race discrimination to Misselt. She additionally filed a report with the Human Resources on February 18, 2022.

42. Six years after first bringing attention to the discriminatory sentiments within the organization, POST, a state sponsored administrative body, failed to take any accountability for its discriminatory actions, let alone remedy the blatant discrimination and retaliation directed at Plaintiff. After the MDHR's finding of retaliation, Plaintiff was further dismissed, humiliated, ostracized, isolated, and treated like an inconvenience by her supervisors and colleagues.

43. The ongoing, unbearable stress caused by the ongoing discrimination, subtle and overt anti-Black sentiment, and retaliation caused Plaintiff emotional distress as well as causing her to fear for her safety in the workplace. Thus, just like the Black OAS before her, Plaintiff had no choice but to leave her job at POST.

44. On March 16, 2022, Plaintiff resigned from her employment stating that "[t]he past six years have repeatedly proved that the environment at the POST Board is that of an unhealthy and racist organization that refuses to treat people equally and promote change for the better [. . .] I believe the handwriting is on the wall, and I have no other choice but to leave [. . .] I am now

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unable to support the organization that I feel is at least partly responsible for the climate in which Black men have lost their lives at the hands of police."

CAUSES OF ACTION

COUNT I

RACE DISCRIMINATION IN VIOLATION OF THE MHRA MINN. STAT. § 363A.01, *et seq.*

45. Plaintiff re-alleges and incorporates the above paragraphs of this Complaint as if fully re-written herein.

46. Under Minn. Stat. § 363A.08, subd. 2 "it is an unfair employment practice for an employer, because of . . . race . . . to . . . (3) discriminate against a person with respect to hiring, tenure, compensation, terms, upgrading, conditions, facilities, or privileges of employment."

47. Defendant failed to take all reasonable steps to prevent discrimination based upon Plaintiff's race from occurring.

48. By its conduct as laid out above, Defendant deprived Plaintiff of equal employment opportunities and otherwise adversely affected her status as an employee.

49. By its actions as described above, Defendant discriminated against Plaintiff with respect to "hiring, tenure, compensation, terms, upgrading, conditions, facilities, or privileges of employment" because of her race in violation of Minn. Stat. § 363A.08.

50. The unlawful employment practices complained above were intentional and were performed by Defendant with malice or reckless indifference to the MHRA, which protects Plaintiff.

51. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered and continues to suffer loss of income, emotional distress, and other damages in an amount in excess of $50,000.00.

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COUNT II

RACE DISCRIMINATION IN VIOLATION OF THE MHRA MINN. STAT. § 363A.01, *et seq.* (HOSTILE WORK ENVIRONMENT)

52. Plaintiff re-alleges and incorporates the above paragraphs of this Complaint as if fully re-written herein.

53. Under Minn. Stat. § 363A.08, subd. 2 "it is an unfair employment practice for an employer, because of . . . race. . . to . . . (3) discriminate against a person with respect to hiring, tenure, compensation, terms, upgrading, conditions, facilities, or privileges of employment."

54. Defendant's conduct constitutes a violation of Minn. Stat. § 363A.08.

55. Defendant failed to take all reasonable steps to prevent racially-hostile work environment, including unwelcome racial harassment from occurring.

56. The racial harassment was severe and pervasive, making it difficult for Plaintiff to perform her job.

57. By its conduct as laid out above, Defendant deprived Plaintiff of equal employment opportunities and otherwise adversely affected her status as an employee.

58. By its actions as described above, Defendants discriminated against Plaintiff with respect to "hiring, tenure, compensation, terms, upgrading, conditions, facilities, or privileges of employment" because of her race in violation of Minn. Stat. § 363A.08.

59. The unlawful employment practices complained above were intentional and were performed by Defendant with malice or reckless indifference to the MHRA, which protects Plaintiff.

60. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered and continues to suffer loss of income, emotional distress, and other damages in an amount in excess of $50,000.00.

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COUNT III

REPRISAL IN VIOLATION OF THE MHRA MINN. STAT. § 363A.15

61. Plaintiff re-alleges and incorporates the above paragraphs of this Complaint as if fully re-written herein.

62. The MHRA provides that it is an "unfair discriminatory practice for any individual . . . to intentionally engage in any reprisal against any person because that person . . . (1) opposed a practice forbidden under this chapter or has filed a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this chapter . . ." Minn. Stat. § 363A.15.

63. By her conduct as described above, Plaintiff engaged in activity protected by MHRA by making reports of race discrimination to Defendant.

64. By their conduct as laid out above, Defendant engaged in reprisal in violation of Minn. Stat. § 363A.15.

65. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered and continues to suffer loss of income, emotional distress, and other damages in an amount in excess of $50,000.00.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Starr Suggs respectfully requests that the Court enter judgment in her favor, for the following relief:

a. That the practices of Defendant complained of herein be adjudged, decreed, and declared to be violations of the rights secured to Plaintiff;

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b. That Defendant be required to make Plaintiff whole for its adverse, discriminatory, retaliatory, and unlawful actions through restitution in the form of back pay, with interest of an appropriate inflation factor;

c. That Plaintiff be awarded front pay and the monetary value of any employment benefits she would have been entitled to in her position with Defendant;

d. That a permanent prohibitory injunction be issued prohibiting Defendant from engaging in the practices complained of herein this Complaint;

e. That Plaintiff be awarded compensatory damages, including loss of past and future income, emotional distress, loss of reputation, and related damages in an amount to be established at trial;

f. That the Court award Plaintiff her reasonable attorneys' fees, costs, and disbursements pursuant to state law; and

g. For all relief available for Defendant's violations of Minn. Stat. § 363A.01, *et seq.*;

h. That the Court grant such other and further relief as it deems fair and equitable.

PLAINTIFF DEMANDS HER TRIAL BY JURY ON ALL COUNTS WHERE AVAILABLE.

Dated: June 9, 2022

HALUNEN LAW

/s/ Maria B. Shatonova

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ACKNOWLEDGEMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney's fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in this pleading are asserted.

Dated: June 9, 2022

/s/ Maria B. Shatonova
Maria B. Shatonova, #401081